

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

ADIB K. TIMBUKTU
3270 N. 21st STREET
MILWAUKEE, WISCONSIN 53206; &



Vs.

CASE NUMBER **21-cv-087**

ACCESSIBLE HOME CARE;
AARIF DAHOD, C.E.O.
3111 N. UNIVERSITY DR.
CORAL SPRINGS, FLORIDA 33065;

LUUL ADAM, DIRECTOR
1672 S. 9th STREET
MILWAUKEE, WISCONSIN 53204

COMPLAINT

The plaintiff alleges that defendant Accessible Home Care, in official capacity and under the colour of law, violated the Plaintiff's 1st, 4th and 5th Amendment Rights to the United States Constitution by depriving the plaintiff of his lawful medical benefits by refusing to pay his home health care worker as a part of an on-going conspiracy to commit fraud against the United States government's medicare/medicaid program.

The plaintiff alleges that defendant Accessible Home Care misappropriated funds paid to them by the government for the plaintiff's care, for their own personal use and gain while citing the plaintiff's inability to comply with their unreasonable and bogus demands as excuses for their failure to pay for his care. To date Accessible continues to unlawfully seize the plaintiff's benefits as evidenced by the fact that the plaintiff has received no written notice from medicare/medicaid, his insurance provider (United Health) or Accessible of termination. To date, Accessible continues to receive government funds yet dispenses no payment for the plaintiff's care.

Throughout his tenure as a client with them, Accessible has repeatedly refused to grant the plaintiff's requests and demands for an accounting of payments made to them by the government and payments made to his caregiver by Accessible in violation of both state and federal law. In the five or so years since the plaintiff has been a client of the defendants, he has NEVER received a financial accounting of payments made in his case so as to cover up their unlawful seizure of his benefits.

These actions by the defendants forced the plaintiff to pay out of pocket and many times personally perform severely difficult, stressful and unreasonable tasks, under duress, which has demonstrably caused his physical and mental health to deteriorate and for him to fall behind in his rent. At the same time the plaintiff was being subjected to these wrongs, the defendants repeatedly denied his numerous requests for supportive care, without which the plaintiff became more isolated and helpless to obstruct their conspiracy of fraud.

On at least three (3) separate occasions the plaintiff attempted to switch health care agencies and on all three occasions defendant Accessible conspired with other health industry officials or workers to thwart this change to a different agency.

Lastly on at least three (3) separate occasions the defendants refused to transfer government assistance payments they received for the plaintiff's care, to the plaintiff's caregiver stating that he had been fired, without (to date) providing the plaintiff or his caregiver with any written notice of appeal rights procedure in violation of the most basic due process protections.

Even after contacting Accessible C.E.O. Dahod, the plaintiff was given the run-around by his executive assistant (who apparently was his wife) thereby defendant Dahod willfully failed to properly monitor and supervise his staff nor address the grievances of his clients.

These constitutional deprivations have taken place within the past 6 months but have been ongoing for years causing the plaintiff irreparable injury.

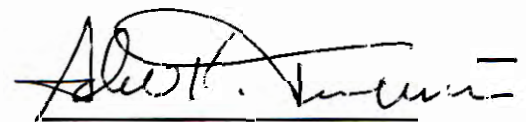
RELIEF WANTED

The plaintiff herein seeks:

1. Monetary relief in the amount of \$1,824,000.00 in actual and punitive damages;
2. Injunctive relief in the form of a consent decree wherein Accessible operations are audited for similar abuses to other beneficiaries who are their clients;
3. That defendant Accessible be put on probation and monitored by the federal government for a period of three years;
4. And that all guilty participants in this conspiracy be prosecuted to the fullest extent of the law.

Dated 7/19/21

Plaintiff By:

A handwritten signature in black ink, appearing to read 'Adib Timbuktu', written over a horizontal line.

Adib Timbuktu, pro se